UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 25 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rene Gonzalez
Engineering and Facility Manager
Micro Matic USA LLC
2386 Simon Court
Brooksville, Florida 34604

SUBJ: RCRA Compliance Evaluation Inspection
Micro Matic USA LLC
EPA ID. No.: FLR 000 194 654

Dear Mr. Gonzalez:

On May 1, 2014, a Compliance Evaluation Inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the Florida Department of Environmental Protection (FDEP) at the Micro Matic USA LLC facility in Brookville, Florida to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA-lead inspection.

Enclosed is the EPA RCRA Site Inspection Report, which indicates that deficiencies of RCRA regulations were discovered. A copy of this report has also been forwarded to FDEP.

If you have any questions regarding this matter, please contact Héctor M. Danois, of my staff, by telephone at (404) 562-8556 or by email at danois.hector@epa.gov.

Sincerely,

Larry L. Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement
and Compliance Branch

Enclosures

cc: Elizabeth Knauss, FDEP SW District
Tim Bahr, FDEP Tallahassee

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Mr. Timothy Bahr
Administrator
Hazardous Waste Program
Florida Department of Environmental Protection
600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: RCRA Compliance Evaluation Inspection
Micro Matic USA LLC
EPA ID. No.: FLR 000 194 654

Dear Mr. Bahr:

On May 1, 2014, a Compliance Evaluation Inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the Florida Department of Environmental Protection (FDEP) at the Micro Matic USA LLC facility in Brookville, Florida to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA-lead inspection.

Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA regulations were discovered. The EPA considers this facility to be a Significant Non-Complier (SNC).

If you have any questions regarding this matter, please contact Héctor M. Danois, of my staff, by telephone at (404) 562-8556 or by email at danois.hector@epa.gov.

Sincerely,

Larry Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement
and Compliance Branch

Enclosures

RCRA Inspection Report

1) Inspector and Author of Report

Héctor M. Danois
Environmental Engineer
RCRA Enforcement and Compliance Branch
EPA Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562 - 8556

2) Facility Information

Micro Matic USA LLC
2386 Simon Court
Brooksville, Florida 34604
EPA ID. No.: FLR 000 194 654

3) Responsible Official

Rene Gonzalez, Engineering and Facility Manager
Micro Matic USA LLC
352.544.1081
rg@micro-matic.com

4) Inspection Participants

Rene Gonzalez	Micro Matic USA LLC
Kevin Crowley	Micro Matic USA, LLC
Elizabeth Knauss	FDEP
Héctor M. Danois	U.S. EPA Region 4

5) Date of Inspection

May 1, 2014

6) Applicable Regulations

RCRA Sections 3005 and 3007
40 Code of Federal Regulations (C.F.R.) Parts 260 - 266, 268, 270 and 273
Chapters 403 & 378, F.S., and Chapters 62-710, 62-730, and 62-737 Florida Administrative Code (F.A.C.)

7) Purpose of Inspection

The purpose of the inspection is to conduct an unannounced U.S. Environmental Protection Agency compliance evaluation inspection (CEI) and determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

8) Facility Description

Micro Matic USA LLC (MM) manufactures beer and wine dispensing equipment from stainless steel and plastic components. MM gets the components from suppliers and reassembles the dispensing equipment. Some of the plastic parts are made by injection molding. Also, stainless steel parts are made or modified using various cutting and machining operations, welding and assembly.

The facility consists of a 90,000 square foot building that includes office space, warehouse space and a production area and has operated at this location since 2008. The company currently has about 150 employees, operating one shift/10 hours, four days per week. The company is on City of Brooksville water and sewer service.

MM notified and is currently operating as a large quantity generator (LQG) of hazardous waste.

9) Findings

On May 1, 2014, Héctor M. Danois with the EPA, along with Elizabeth Knauss with FDEP, arrived at the facility. At approximately 10:00 a.m., Mr. Gonzalez received the inspectors. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit. The following areas were inspected:

Assembly

MM assembles stainless steel, brass and plastic components to assemble the faucets and regulators.

As part of surface finishing process, some stainless steel parts are degreased (hot water and potassium hydroxide). After cleaning in two rinse tanks, the stainless steel parts are ready for immersion in a passivation acid bath (prevent corrosion) using nitric acid, following a number of rinses. To minimize rinse water use, MM exchanges the most concentrated rinse bath and the overflow from one tank becomes the feed for the rinsing tank preceding it. The emptied rinse tank water is pumped through overhead pipes to a treatment system located within secondary containment in a roofed area outside the west wall of the building. (See Figure 1 - the system is discussed further below). No sludge is generated in the process tanks. Additionally, MM uses an ammonium bi-fluoride based PVD stripper unit to remove paint or color from stainless steel part. The mobile unit is not always used.

At the time of the inspection, MM show analytical record to the inspection team that showed that the rinse waters that goes to the outside storage tank is hazardous for Chromium (17 mg/L). In addition, a deionizing system for purifying water used in the final rinse tanks is maintained by Siemens.

Fabrication

This is the area where MM conducts standard injection molding, various cutting and machining operations (just 10% of parts), some tack welding and surface treatment.

Cleaning and polishing is also done using citrus based cleaner in vibratory polisher. Waste water from the vibratory polisher is also treated in the on-site system. Scrap steel parts are sent out for recycling.

Hazardous Waste Storage

The chemical and hazardous waste storage area is located in the west side of the main building, adjacent to the loading dock. This is the area where MM stores process chemicals, scrap metal, used and unused oil, and the ammonium bi-fluoride process solution when not in use. This area also has a separate containment area for the system used to collect and treat the spent rinse waters. Rinse water is pumped from the process area into a plastic collection tank (approx. 300-gallon). The tank stores the rinse waters before they are pumped to the evaporator.

Both the evaporator and storage tank have secondary containment (See Figure 2). The evaporator is a natural gas fired EMC Water Eater; model 240 G-SS, with a capacity of 240-gallons. The evaporator automatically pumps rinse waters from the head tank when the fluid level falls below 50 gallons. As the influent waste water is characteristically toxic, the inspection team determined that the tank system is storing hazardous waste. The system is not an exempt waste water treatment unit under 40 C.F.R. § 260.10, as the facility has never discharged this waste to the public sewer system. At the time of the inspection, the tanks were labeled. However, the tank system had not been cleaned out every 90 days as required by 40 C.F.R. § 262.34(b) in order to demonstrate that the system is exempt from hazardous waste permit requirements. In addition, the vent pipe from the evaporator was showing sign of corrosion (See Figure 3).

A LQG of hazardous waste that accumulates its hazardous waste in tanks must comply with the regulations of Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. 265, Subpart J – Tank Systems], referenced from Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(ii)].

Pursuant to Fla. Admin. Code Ann. r. 62-730.180(2)[40 C.F.R. § 265.190-196] , which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(1)(ii)], that allows the generator to store hazardous waste in tanks. This regulation requires the facility the following:

- ***A certification from a registered professional engineer that the system was constructed complies with 40 C.F.R. § 265.192 and 193 standards applicable to new tank systems.***
- ***General operating requirements - 40 C.F.R. § 265.194***
- ***Inspection requirements - 40 C.F.R. § 265.195***
- ***90-days waste turnover - 40 C.F.R. § 262.34(a)(1)(ii)***

At the time of the inspection MM was in apparent violation of these regulations because MM did not have documentation demonstrating the tank is emptied every 90-days and that daily inspections were documented. In addition, some equipment in the evaporator was showing corrosion.

Near the evaporator area, was a 55-gallon plastic container storing sludge from the evaporator (See Figure 4). The container was labeled and dated (4/25/14). In addition a labeled 55-gallon drum of used oil was present.

In the other side of the evaporator in racks, MM was storing a 55-gallon drum of oily rags and towels, a 250-gallon tote of used degreaser dated 12/13/13 (Figure 5), a 55-gallon drum of used oil and a 250-gallon tote of caustic process water from the passivation process area (12/6/13).

MM may have failed to adhere to a condition for exemption from Fla. Stat. § 403.722 [RCRA § 3005] given in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(b)]. This regulation requires a generator who stores hazardous waste for more than 90 days must obtain a permit for the treatment, storage, and disposal of hazardous waste in accordance with the requirements of Fla. Admin. Code Ann. r. 62-730.220 [40 C.F.R. Part 270].

MM may have failed to adhere to a condition for exemption from Fla. Stat. § 403.722 [RCRA § 3005] given in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(3)]. This regulation requires containers of hazardous waste that are accumulated on-site to be marked with the words "hazardous waste." MM is in apparent violation by not properly labeling the 250-gallon tote and 55-gallon container of caustic process water.

Stamping

Some of the stainless steel parts are stamped for identification. For laser stamping, the faucet body is searched for scratches. The metal is polished and cleaned before and after the stamping. For electro chemical stamping, the parts are cleaned and then coated with an electrolyte solution before etching the parts. Then, the area is chemically neutralized and cleaned again with a wipe or rags. All rags goes to the trash. At the time of the inspection, MM had not performed a waste determination on the rags before disposal.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste is required to determine if that waste is a hazardous waste. MM is in apparent violation of this regulation by not making a waste determination on the wipes or rags.

Recordkeeping

Documents and records that the inspection team reviewed included; contingency plan, used oil records (Last pick up by FCC Environmental on 6/12/13), rinse water tank analytical (17 mg/L of Cr), degreaser analytical (8.5 mg/L of Cr) and waste tank certification (11/12).

At the time of the inspection, the inspection team noticed that MM didn't have the following: weekly inspections, manifests or waste profiles, personnel hazardous waste management training documentation, certificates and position descriptions.

MM has failed to adhere to a condition for exemption from Fla. Stat. § 403.722 [RCRA § 3005] given in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(1)(i) which incorporates 40 C.F.R. § 265.174]. This regulation requires a generator must inspect containers of accumulated hazardous waste for leaks and deterioration on a weekly basis. MM is in apparent violation of this regulation by not conducting weekly inspections on containers storing hazardous waste.

MM has failed to adhere to a condition for exemption from Fla. Stat. § 403.722 [RCRA § 3005] given in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(1)(ii) which incorporates 40 C.F.R. § 265.195]. This regulation requires a generator must inspect tanks of accumulated hazardous waste for leaks and deterioration on a daily basis. MM is in apparent violation of this regulation by not conducting daily inspections on a tank storing hazardous waste.

MM has failed to adhere to a condition for exemption from Fla. Stat. § 403.722 [RCRA § 3005] given in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(4) which incorporates 40 C.F.R. § 265.16]. This regulation requires the facility to develop and implement a complete personnel training program to ensure compliance with hazardous waste management regulations. MM is in apparent violation of this regulation by not providing training to personnel that manage hazardous waste, as well as job title and position description describing requisite skill, education, or other qualifications, and duties of employees assigned.

10) Signed

Héctor M. Danois
Environmental Engineer

11-24-14
Date

11) Concurrence

Larry L. Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

11/25/14
Date

Attachment 1 – Photo Log

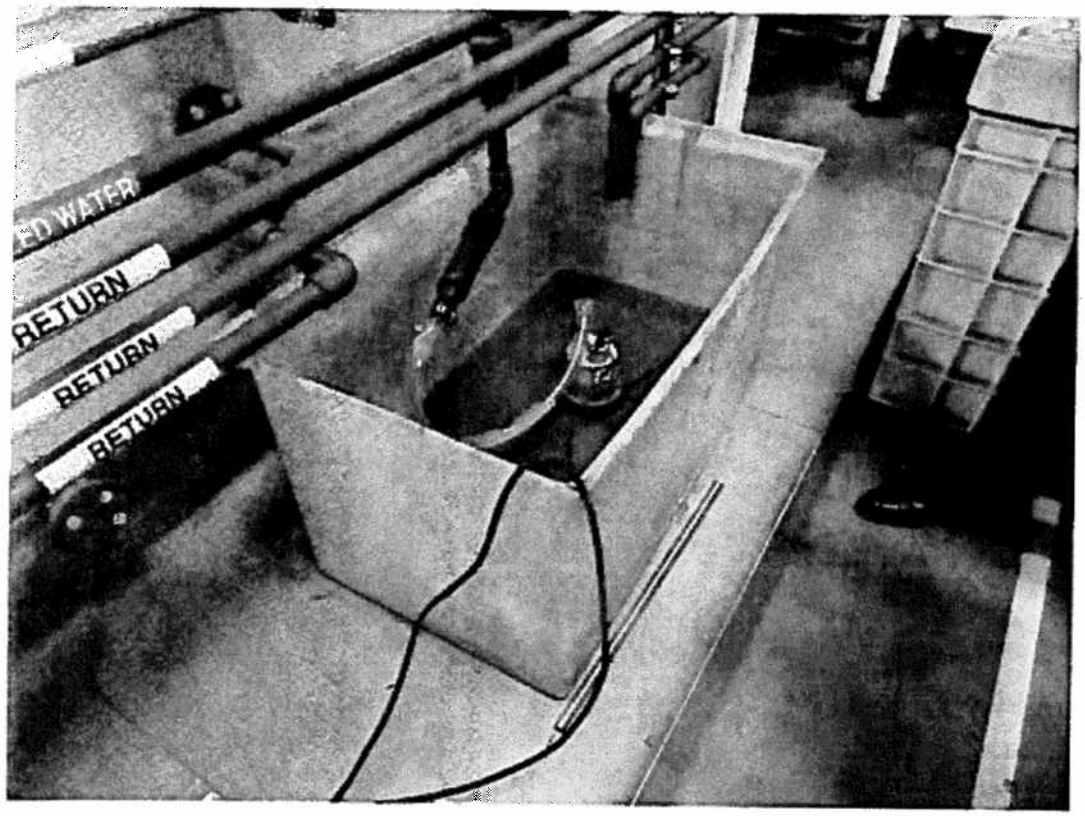

Figure 1 – Rinse water pumping system

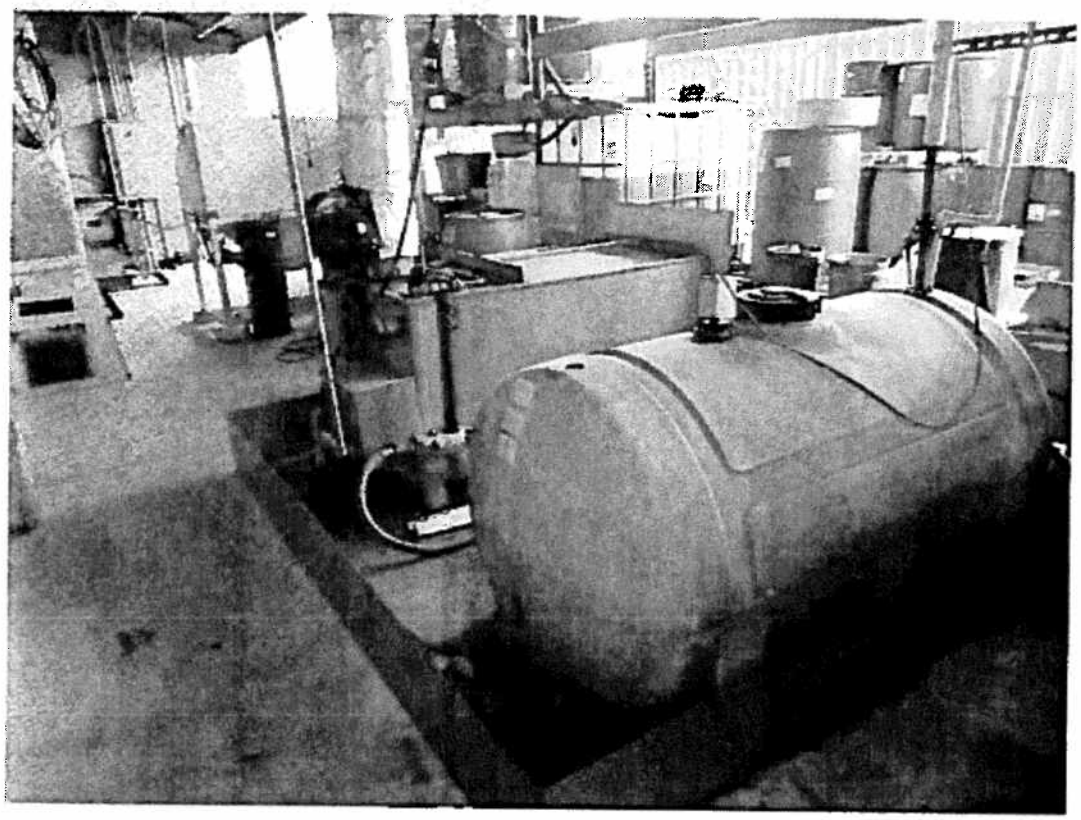

Figure 2 – Rinse Water Storage tank and evaporator

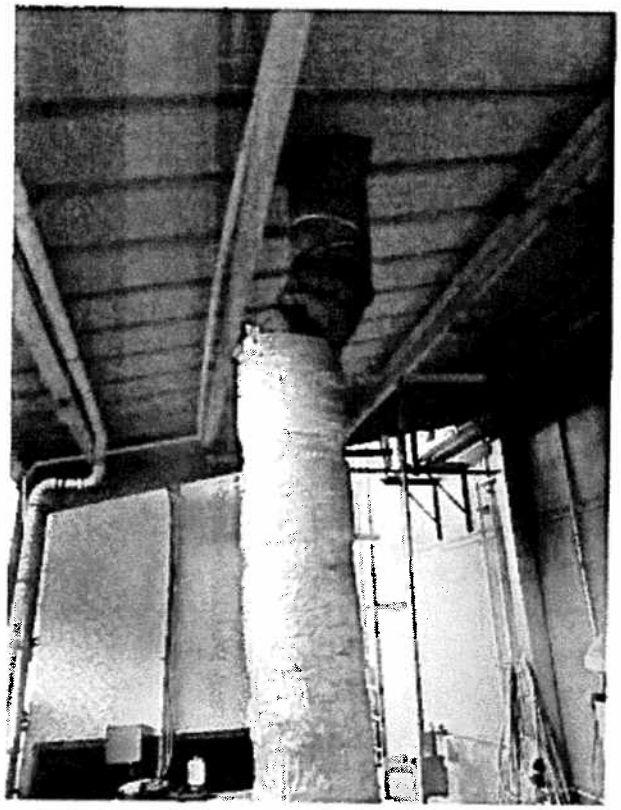

Figure 3 – Vent pipe from the evaporator was showing sign of corrosion

Figure 4 -55-gallon container storing sludge from the evaporator

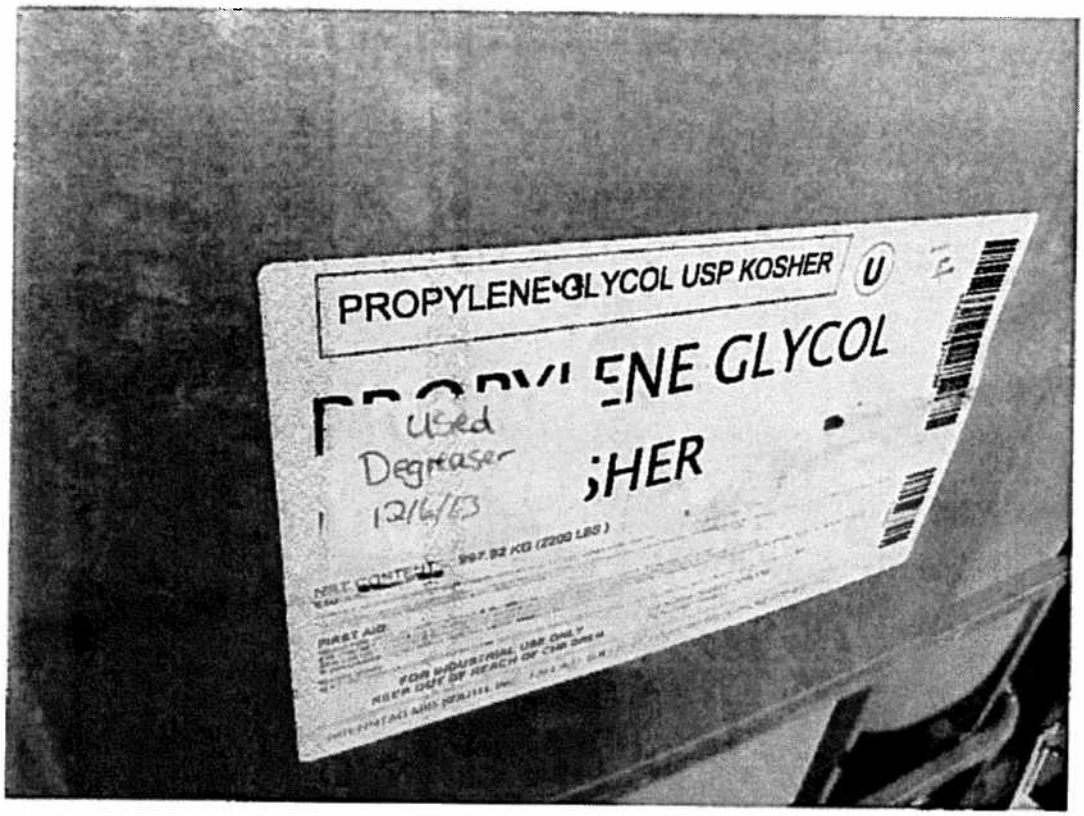

Figure 5 – 250-gallon tote string used degreaser